

1 **NELSON W. GOODELL, ESQ., SBN 264734**

2 The Goodell Law Firm
3 5 Third Street, Suite 1100
4 San Francisco, CA 94103
5 Tel. No. (415) 495-3950 (office)
6 Fax No. (415) 495-6900 (fax)

7 **Attorney for Plaintiff**
8 **DEBORAH TAMBURRI**

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 DEBORAH TAMBURRI,

12 Plaintiff,

13 v.

14 SUNTRUST MORTGAGE, INC.; WELLS
15 FARGO BANK, N.A.; U.S. BANK NATIONAL
16 ASSOCIATION; MORTGAGE ELECTRONIC
17 REGISTRATION SYSTEMS, INC. and
18 RECONTRUST COMPANY, N.A.; and DOES 1-
19 20;

20 Defendants.

Case No. 3:11-CV-02899-EMC

Hon. Judge Edward M. Chen

**JOINT STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE**

Hearing Date:

Date: February 7, 2013

Time: 10:30 a.m.

Crtrm.: 5, 17th Floor

Proposed Hearing Date:

Date: February 28, 2013

Time: 1:30 p.m.

Crtrm.: 5, 17th Floor

Complaint Filed: April 13, 2011

First Amended Complaint Filed: June 10, 2011

Second Amended Complaint Filed: March 27
2012

Third Amended Complaint Filed: January 8, 2013

Trial Date: August 26, 2013

25 WHEREAS, there is a Status Conference in this matter scheduled for February 7, 2013 at
26 10:30 a.m.;

27 WHEREAS, Plaintiff's counsel has a hearing on a preliminary injunction on February 7, 2013
28 in the Sacramento County Superior Court at 9:00 a.m.;

1 WHEREAS, Defendants Wells Fargo Bank, N.A.; SunTrust Mortgage, Inc.; U.S. Bank,
2 National Association and Mortgage Electronic Registration Systems, Inc. have filed a Motion to
3 Continue the Trial in this matter, and that hearing is scheduled for February 28, 2013 at 1:30 p.m.;

4 WHEREAS, the Parties wish to conserve resources and wish to have the Status Conference
5 conducted on the same day and time as the Motion to Continue the Trial in this matter;

6 THEREFORE, the parties hereby stipulate and agree that the hearing date for the Status
7 Conference should be continued to February 28, 2013 at 1:30 p.m.;

8 A joint CMC Statement shall be filed by February 21, 2013.

9 Dated: January 31, 2013

AKERMAN SENTERFITT LLP

10 By: /s/ Bryan M. Leifer

11 Bryan M. Leifer

12 Attorneys for Defendants

13 SUNTRUST MORTGAGE, INC., MORTGAGE
14 ELECTRONIC REGISTRATION SYSTEMS, INC.;
15 U.S. BANK NATIONAL ASSOCIATION, AS
16 TRUSTEE, FOR STARM 2007-2; WELLS FARGO
17 BANK, N.A.

16 Dated: January 31, 2013

THE GOODELL LAW FIRM

17 By: /s/ Nelson Goodell

18 Nelson Goodell

19 Attorneys for Plaintiff,

20 DEBORAH TAMBURRI

21 Dated: January 31, 2013

REED SMITH LLP

22 By: /s/ John Pingel

23 John Pingel

24 Attorneys for Defendant,

25 RECONTRUST COMPANY, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEBORAH TAMBURRI,

Plaintiff,

v.

SUNTRUST MORTGAGE, INC.; WELLS
FARGO BANK, N.A.; U.S. BANK NATIONAL
ASSOCIATION; MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC. and
RECONTRUST COMPANY, N.A.; and DOES
1-20;

Defendants.

Case No. 3:11-CV-02899-EMC

Hon. Judge Edward M. Chen

**[PROPOSED] ORDER ON JOINT
STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE**

Hearing Date:

Date: February 7, 2013

Time: 10:30 a.m.

Ctrrm.: 5, 17th Floor

Proposed Hearing Date:

Date: February 28, 2013

Time: 1:30 a.m.

Ctrrm.: 5, 17th Floor

IT IS HEREBY ORDERED that the Case Management Conference be continued from
February 7, 2013 at 10:30 a.m. to February 28, 2013 at 1:30 p.m.. A Joint Case Management
Statement is due on February 21, 2013.

Dated: 2/1/13

By:

